

29, July 2022

CALL FOR COMMENTS ON THE DRAFT WHO GUIDELINE: POLICIES TO PROTECT CHILDREN FROM THE HARMFUL IMPACT OF FOOD MARKETING

Response of European Specialist Dietetic Network (ESDN) for Public Health of the European Federation of the Associations of Dietitians (EFAD)¹.

We really welcomed the opportunity to participate in this consultation, and we hope our comments are helpful for the development of this guidelines:

Considerations and implications for adaptation and implementation of the guidance

- We welcome the suggestion of using nutrient profile models to identify foods whose marketing should be restricted. Nutrient profile models must be consistent for preventing obesity and other non-communicable-diseases and should be based on national food-based dietary guidelines, which could be applied to all products and with a clearly defined cut-off. In addition, policies in place must ensure that nutrient profile models work for different purposes, such as nutrition and health claims, front of package nutrition labeling or food and drink taxes, to allow consistency with public health objectives (1). However, inconsistencies in classification of certain foods according to the nutrient profile model used, need to be considered. For example, the European nutrient profile model would permit marketing of some commonly consumed types of fast food, such as fried chicken, due to its high protein content. In contrast, the Eastern European nutrient profile model explicitly mentions the restriction of advertising of these products. Consistency among nutrient profile models should be considered to prevent cross-border marketing of certain products. This should be emphasized in recommendation 2 in

¹Zoi Toumpakari (United Kingdom), Amanda Avery, (United Kingdom), Teresa Rodrigues (Portugal), Elena Carrillo (Spain), Zeynep Begüm Kalyoncu (Turkey) Bernadette Kiss-Toth (Hungary) and Manuel Moñino (Spain). <http://www.efad.org/en-us/specialists-networks/public-health/>

addition to minimising the risk of migration of marketing to other channels.

- More clear and specific guidance could be provided on how governments can deal with industry opposition, in order to implement restrictions in food marketing. Influencing the policymaking process, via practices, such as lobbying, has been previously documented as a common strategy used by the food industry to maintain a 'business-friendly regulatory environment' (2). Hence, a more nuanced description of how policymakers can deal with industry opposition is needed.
- We believe that a clear definition, as well as list of persuasive elements used in powerful food marketing should be identified. We additionally argue for monitoring the use of these techniques, to avoid the use of similar 'novel' techniques in the future.
- Brand marketing is a common technique used by the food industry to create brand loyalty (2). We therefore support proposed restrictions on brand marketing, although these are the ones most likely to face strong opposition (3). Clear definitions of which brands should be restricted are needed, which in addition to brands synonymous to 'unhealthy' foods (highlighted in the guideline), could be further informed by their likelihood to have power to attract children and have expected exposure of children to this brand (3).
- The guideline refers to food marketing restrictions in outdoor settings, but these settings could be made more specific to aid policymakers in the decision making stage. Recent evidence supports the implementation of food marketing restrictions in outdoor settings, such as the Transport for London Network (4), by suggesting a reduction in purchasing of high in fat, salt or sugar (HFSS) products, following the implementation of this policy. Advertising bans for outdoor settings, e.g., bus stops, have been introduced in more UK cities, e.g., Bristol. An evaluation of their impact on critical and important outcomes will shed additional light on the impact of these policies in outdoor settings.
- A challenge in implementing food marketing restrictions in outdoor advertising sites, e.g. bus stops, is that not all of these sites are owned by local councils and are rather privately owned. They may therefore fall outside the jurisdiction of

policies aiming to introduce restrictions in food marketing. The guideline should emphasise this challenge and explicitly recommend broad application of policies regardless of owning rights.

Context and setting-specific issues that have not yet been captured

- We argue for the importance of policy framing to increase public acceptability and minimise opposing views. We suggest that food marketing policies should be communicated alongside other dietary policies e.g., policies on the school food environment, nutritional labelling, taxes, etc, to increase public support. We also argue that food marketing policies should be framed alongside valued co-benefits that have been identified in the literature, e.g., a reduction in exposure to harmful commercial practices(3). Evidence suggests that framing policies alongside valued co-benefits or other policies that tackle similar aspects of the public health issue are likely to increase public support for these policies(5).

Errors of fact or missing data

- We believe that the guideline should emphasise the need for food marketing policies to target not only children from low socioeconomic backgrounds, but also from ethnic minorities, as evidence suggest higher exposure to food marketing for both these population sub-groups(6).

General comments

- The guideline talks about dealing with industry opposition by 'showing that well-designed policies do not pose substantive trade concerns'. It is not clear to the extent that this is well documented in the literature or if further studies are needed. Existing research argues for additional interdisciplinary studies to examine the intersection of food marketing policies and economic policies for successful implementation of the former and this should be made clear in the guideline(3).
- The report mentions that more high-quality studies are needed to measure the impact of restrictions in food marketing on dietary intake. We believe that it should be made clear that future studies should assess dietary intake throughout the day, rather than an acute measure of diet following exposure to food marketing. This will account for compensatory dietary intake

and provide a more accurate picture of the impact of restrictions in food marketing on dietary intake.

- We argue that future studies should not only assess objective exposure to food marketing, but also perceptions around what and how many adverts children are exposed to. Perceptions of the food environment have been found to better predict dietary intake compare to objective measures(7), hence, exploring perceptions of food marketing exposure, as well as 'true' exposure to food marketing is important.
- The guideline should acknowledge and encourage future studies to use a longitudinal study design to evaluate the effectiveness of food marketing policies and allow a better understanding of the impact of these policies on critical and important outcomes in the long-term.

References

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